

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

APEX LINEN SERVICE LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-11774 (LSS)

Jointly Administered

Hearing Date: August 7, 2020, 2:00 p.m. (EDT)

Re: Docket Nos. 10, 43, 112

**NOTICE OF WITHDRAWAL UPON ENTRY OF AGREED ORDER OF  
PRE-PETITION LENDERS' OBJECTION TO DEBTORS' APPLICATIONS TO:  
(1) EMPLOY, RETAIN, AND DESIGNATE CHIEF RESTRUCTURING OFFICER, AND  
(2) EMPLOY AND RETAIN COUNSEL**

PLEASE TAKE NOTICE that, subject to entry by this Court of the form of Order agreed by the parties and attached as Exhibit A to the *Certification of Counsel With Respect to: (1) Orders Approving Retentions of Goldstein & McClintock LLP; GlassRatner Advisory & Capital Group, LLC; and FocalPoint Securities, LLC; and (b) Resolving Other Matters Between Debtors and Pre-Petition Lenders* [ECF No. 114], Breakwater Management LP, as agent for senior secured lenders Breakwater Credit Opportunities Fund LP, Breakwater Credit Opportunities Fund II, LP, Western Alliance Bank, and United Insurance Company of America (collectively, such lenders are referred to as the "Pre-Petition Lenders"), by and through its undersigned counsel, hereby withdraws the *Pre-Petition Lenders' Objection to Debtors' Applications to: (1) Employ, Retain, and Designate*

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<sup>1</sup> The Debtors in the above-captioned chapter 11 cases, along with their case numbers, are: Apex Linen Service LLC (20-11774) ("Apex Linen"), Highland Apex Holdings LLC (20-11775) ("Apex Holdings"), Highland Avenue Capital Partners LLC (20-11776) ("Highland PE"), Highland Apex GP LLC (20-11777) ("Highland GP"), and Highland Apex Management LLC (20-11778) ("Highland Management"). Apex Holdings and Apex Linen are the "Apex Debtors". Highland PE, Highland GP and Highland Management are the "Highland Debtors". Apex Debtors and Highland Debtors are collectively referred to as the "Debtors".

*Chief Restructuring Officer, and (2) Employ and Retain Counsel*, which was filed on July 31, 2020 [ECF No. 112].

As to the Debtors' application for authority to employ and retain Goldstein & McClintock LLP as Debtors' counsel *nunc pro tunc* to the Petition Date [ECF No. 43], the Pre-Petition Lenders agree to entry of the form of Order that was attached to that application.

Dated: August 4, 2020  
Wilmington, Delaware

**GIBBONS P.C.**

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